

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF OKLAHOMA**

HULL’S ENVIRONMENTAL SERVICES, INC.,)	
)	
)	
Plaintiff,)	
)	
vs.)	Case No. <u>6:24-cv-00479-JAR</u>
)	
UNITED STATES OF AMERICA ex rel)	
SECRETARY OF ARMY/U.S. ARMY)	
CORPS OF ENGINEERS; et al.)	
)	
Defendants/Cross-Plaintiffs.)	

**ARGONAUT INSURANCE COMPANY’S UNOPPOSED MOTION TO EXTEND TIME
TO ANSWER MARINA DEL REY, LLC’S COUNTERCLAIM**

Pursuant to LCvR7.1(i), Defendant/Counter-Defendant/Cross-Plaintiff, ARGONAUT INSURANCE COMPANY, moves for an order granting an unopposed extension of time to answer Marina Del Rey, LLC’s Counterclaim under Rule 12 of the Federal Rules of Civil Procedure, and in support shows as follows:

1. Plaintiff Hull’s Environmental Services, Inc, (“Plaintiff”), initiated this litigation in an action captioned *Hull’s Environmental Services, Inc. v. Marina Del Rey, LLC, et al.*, bearing cause number CJ-2024-86, from the District Court of Marshall County, State of Oklahoma.
2. On December 12, 2024, Secretary of Army/U.S. Army Corps. of Engineers removed the Marshall County Action to the United States District Court for the Eastern District of Oklahoma.
3. On December 20, 2024, Argonaut filed its Crossclaim against Marina Del Rey [Dkt. 11].
4. On May 23, 2025, Marina Del Rey filed its Answer to Argonaut’s Crossclaim and Counterclaim against Argonaut. [Dkt. 44].

5. Argonaut's Answer to Marina Del Rey's Counterclaim is currently due June, 13 2025.

6. Marina Del Rey has agreed to extend the time for Argonaut to answer the Counterclaim until June 27, 2025.

7. This Motion is not sought for delay but made in the interests of justice and judicial economy.

8. Argonaut has not previously requested any extension of time to respond to the Counterclaim in this case from this Court.

9. This requested extension will have no impact on the scheduled trial or other deadlines, as none have been entered to date.

WHEREFORE, Argonaut prays that the Court grant this Motion and enter an order extending the time for Argonaut to answer the Counterclaim until June 27, 2025.

Dated June 12, 2025.

Respectfully submitted,

/s/ Stephen A. Melendi

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ATTORNEY FOR DEFENDANT,

ARGONAUT INSURANCE COMPANY

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on the 12th day of June, 2025, a true and correct copy of the foregoing document was filed using the Court's electronic filing/notification system (ECF) to all known parties of record.

/s/ Stephen A. Melendi

Stephen A. Melendi